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12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 AXS GROUP LLC,
15 Plaintiff,

16 v.

17 EVENT TICKETS CENTER, INC.;
18 TICKETNETWORK, INC.; VIRTUAL
19 BARCODE DISTRIBUTION LLC;
and SECURE.TICKETS,

20 Defendants.

Case No. 2:24-CV-00377-SPG (Ex)

**STIPULATION TO EXTEND TIME
FOR PLAINTIFF AXS GROUP LLC
TO RESPOND TO DEFENDANT
TICKETNETWORK, INC.'S
COUNTERCLAIMS BY 30 DAYS**

**COUNTERCLAIMS SERVED:
JANUARY 30, 2025**

**CURRENT RESPONSE DATE:
FEBRUARY 20, 2025**

**NEW REONSE DATE:
MARCH 24 2025**

23 Plaintiff AXS Group LLC ("AXS" or "Plaintiff") and Defendant
24 TicketNetwork, Inc. ("TicketNetwork") stipulate and respectfully request that the
25 Court extend the deadline for AXS to answer or otherwise respond TicketNetwork's
26 Counterclaims by thirty days.

27 WHEREAS, on January 16, 2024, Plaintiff filed a Complaint in this action
28 against five Defendants (ECF No. 1);

1 WHEREAS, Plaintiff filed a First Amended Complaint on May 6, 2024 adding
2 two additional defendants (ECF No. 39);

3 WHEREAS, Plaintiff filed a Second Amended Complaint on December 9,
4 2024 adding TicketNetwork as an additional Defendant (ECF No. 83);

5 WHEREAS, on January 30, 2025, TicketNetwork filed its Corrected Answer
6 and Counterclaims to Plaintiff AXS Group LLC's Second Amended Complaint
7 making AXS's response to Counterclaims due February 20, 2025 (ECF 94);

8 WHEREAS, the parties have not previously requested an extension of time for
9 AXS to respond to TicketNetwork's Counterclaims;

10 WHEREAS, the parties have been engaging in discussions to explore a
11 possible resolution of this matter and having additional time to engage in further
12 discussions will be beneficial to the potential for an early resolution;

13 WHEREAS, AXS and TicketNetwork agree to a thirty (30) day extension of
14 time to Plaintiff's deadline to answer or respond to TicketNetwork's Counterclaims
15 so they can continue discussing a resolution to this matter;

16 THEREFORE, AXS and TicketNetwork stipulate to a thirty (30) day
17 extension of time, making AXS's answer or response to the First Amended
18 Complaint due on March 24, 2025.

19 It is so stipulated.

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1 Dated: February 13, 2025

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13
14 Dated: February 13, 2025

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23
24 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filing party hereby attests that all
25 signatories listed, and on whose behalf the filing is submitted, concur in the filing's
26 content and have authorized this filing.
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CERTIFICATE OF SERVICE

2 I hereby certify that on February 13, 2025, a true and correct copy of the
3 foregoing was filed electronically using the Court's CM/ECF system, which shall
4 send notification of such filing to all counsel of record. Any counsel of record who
5 has not consented to electronic service through the Court's CM/ECF system will be
6 served by electronic mail.

/s/ J. Michael Keyes
J. Michael Keyes, SBN 262281